

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

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CRIMINAL NO.: 12-121

v.

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SECTION: "F"

GINA M. SEAWRIGHT

*

a/k/a Kelly Heliferich

a/k/a Amamda Hollingsworth

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a/k/a Amanda Hollingsworth

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FACTUAL BASIS

The defendant, **GINA M. SEAWRIGHT** (hereinafter the "defendant" or "Seawright"), has agreed to plead guilty as charged to Count 1 of the Bill of Information charging her with making, uttering and possessing counterfeit securities, in violation of Title 18, United States Code, Section 513(a). Should this matter have gone to trial, both the Government and the defendant, **SEAWRIGHT**, do hereby stipulate and agree that the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the Government would have proven these facts beyond a reasonable doubt at trial. The Government and the defendant further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the Bill of Information now pending against the defendant:

A special agent with the U.S. Secret Service would testify that on or about December 3, 2011, **SEAWRIGHT** purchased a 2006 white Dodge Magnum 4-door sedan, VIN 2D4GZ57286H382410 from Deal'N Doug's Autoplex in Metairie, Louisiana using a fraudulent Tennessee driver's license in the name of Amamda (sic) Hollingsworth. **SEAWRIGHT** purchased the vehicle using a counterfeit Liberty Bank and Trust Company cashier's check in the amount of \$16,717.00. A certified copy of the counterfeit Liberty Bank and Trust cashier's check, no. 14211003 in the amount of \$16,717.00, would be offered as evidence at trial. The Government would also offer as evidence a certified copy of the Bill of Sale as well as other documentation memorializing the sales transaction. The manager of Deal'N Doug's Autoplex would testify that on December 7, 2011, he was notified by his bank, that the Liberty Bank and Trust cashier's check **SEAWRIGHT** used to purchase the Dodge Magnum was counterfeit.

An Assistant Vice President from Liberty Bank and Trust Company would testify that he has examined the Liberty Bank and Trust Company counterfeit check no. 14211003, possessed and uttered by **SEAWRIGHT**, and has determined that the check is counterfeit based on the following criteria: 1) the layout of the cashier's check is in a different format than the official bank cashier's check; 2) the address shown on the counterfeit check is not consistent with the address shown on the bank's official cashier's check; 3) an official Liberty Bank cashier's check requires a signature by an authorized Bank Officer; 4) although the routing number is correct on the counterfeit check, the account number provided is not consistent with the bank's cashier's check account number; 5) the counterfeit check indicates "Void After (180) days" and the official bank cashier's check does not indicate a void period. Finally, the bank's official cashier's check does not include a memo section.

On or about December 21, 2011, **SEAWRIGHT** purchased a 2011, black Suzuki motorcycle, model no. GSX1300RL1 with VIN JS1GX72A4B2102525, from New Orleans Power Sports in Kenner, Louisiana using a fraudulent Tennessee driver's license in the name of Amamda (sic) Hollingsworth. **SEAWRIGHT** purchased the motorcycle using a counterfeit Regions Bank cashier's check in the amount of \$15,528.00. A certified copy of the counterfeit Regions Bank cashier's check, no. 68745 in the amount of \$15,528.00, would be offered as evidence at trial. The Government would also offer a certified copy of the Bill of Sale for the 2011 black Suzuki motorcycle as well as other documentation memorializing the sales transaction as evidence at trial.

On or about December 22, 2011, **SEAWRIGHT** purchased a 2011, black Suzuki motorcycle, model no. GSX1300RL1 with VIN JS1GX72A6B2101652, from Lightspeed Motorsports in Gonzales, Louisiana using a fraudulent Tennessee driver's license in the name of Amamda (sic) Hollingsworth. **SEAWRIGHT** purchased the motorcycle using a counterfeit Regions Bank cashier's check in the amount of \$13,497.37. A certified copy of the counterfeit Regions Bank cashier's check, no. 68746 in the amount of \$13,497.27, and documentation memorializing the sale of the motorcycle would be offered as evidence at trial.

On or about December 27, 2011, **SEAWRIGHT** purchased a 2011, white Suzuki motorcycle, model no. GSX1300RL1 with VIN JS1GX72AOB2101954, from the Cycleshack in Picayune, Mississippi using a fraudulent Tennessee driver's license in the name of Amamda (sic) Hollingsworth. **SEAWRIGHT** purchased the motorcycle using a counterfeit Regions Bank cashier's check in the amount of \$14,595.06. A certified copy of the counterfeit Regions Bank cashier's check, # 68747, in the amount of \$14,595.06 and documentation memorializing the sale of the motorcycle would be offered as evidence at trial.

On or about January 4, 2012, **SEAWRIGHT** purchased a 2011, black and red Suzuki motorcycle, model no. GSX1300RL1 with VIN JS1GX72A5B2102971, from Suzuki City in Biloxi, Mississippi using a fraudulent Tennessee driver's license in the name of Amamda (sic) Hollingsworth. **SEAWRIGHT** purchased the motorcycle using a counterfeit Regions Bank cashier's check in the amount of \$13,500.00. A certified copy of the counterfeit Regions Bank cashier's check, no. 68748 in the amount of \$13,500.00, the Bill of Sale and documentation memorializing the sale of the motorcycle would be offered as evidence at trial.

On January 19, 2012, **SEAWRIGHT** was voluntarily interviewed by law enforcement and confessed to purchasing the 2006 white Dodge Magnum 4-door sedan, VIN 2D4GZ57286H382410, with a counterfeit check that she received via Federal Express from an accomplice known as "Fool" who currently resides in Orlando, Florida. **SEAWRIGHT** also admitted to purchasing the above identified Suzuki motorcycles in Kenner, Louisiana, Gonzales, Louisiana, Picayune, Mississippi, and Biloxi, Mississippi with the counterfeit securities she personally produced. **SEAWRIGHT** stated that following each purchase of the motorcycles, she would sell them to various individuals for \$3,000.

Specifically, **SEAWRIGHT** was shown all of the above counterfeit cashier's checks and identified all of them as the instruments used to purchase the 2006 white Dodge vehicle and all of the above-mentioned Suzuki motorcycles. **SEAWRIGHT** further admitted to making and printing, with the use of her personal computer, all the Regions Bank counterfeit cashier's checks used to purchase the Suzuki motorcycles while she was staying at the La Quinta Inn in Gretna, Louisiana.

On January 19, 2012, **SEAWRIGHT** signed a written consent to search the 2006 white Dodge Magnum sedan. During the search of the vehicle, law enforcement discovered one unsigned

Regions Bank counterfeit cashier's check, no. 68749 in the amount of \$15,489.00, made payable to Motioncycle Sports, 19189 Lake Charles Highway, DeRidder, Louisiana. The original counterfeit cashier's check would be offered as evidence at trial.

A Vice President from Regions Financial Corporation would testify that he has examined all the Regions Bank counterfeit checks, possessed, produced or uttered by **SEAWRIGHT** bearing routing number 065403626 and has determined that the checks are counterfeit based on the following criteria: 1) all the counterfeit checks are imprinted at the top with "Regions Bank and Trust," and Regions Bank has never used this title in any business venture or practice; 2) each counterfeit check is marked with a notation in the bottom left indicating "from the account . . ." and Regions does not place any source data on cashier's checks other than the remitter's name; 3) the account number used on the counterfeit checks is not the account number of Regions' cashier's checks checking account, but is a former account number of a local government agency. Finally, the general layout and design of the counterfeit cashier's checks is not similar to the layout of any authentic Regions Bank cashier's check.

The counterfeit securities **SEAWRIGHT** possessed, produced and uttered were of organizations that operate in, and whose activities affect, interstate commerce.

GINA M. SEAWRIGHT
Defendant

DATE

CYNTHIA CIMINO
Assistant Federal Public Defender
Counsel for Defendant

DATE

JULIA K. EVANS
Assistant United States Attorney

DATE